

EXHIBIT B

Issued by the
UNITED STATES DISTRICT COURT

Tables:

B

Middle

DISTRICT OF

Pennsylvania

TAMMY KITZMILLER

V.

DOVER AREA SCHOOL DISTRICT; DOVER AREA
SCHOOL DISTRICT BOARD OF DIRECTORS

SUBPOENA IN A CIVIL CASE

Case Number:¹ 04-CV-2688 (M.D. Pa.)

TO: York County Daily Record
122 S. George Street
York, PA 17405

- YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

- YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
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- YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or place, date, and time specified below (list documents or objects):

See Attached Exhibit A

PLACE Dover Area School District; 2 School Lane; Dover, Pennsylvania 17315	DATE AND TIME June 7, 2005 at 9:00 a.m.
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- YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR  Attorney for Defendants	DATE May 24, 2005
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ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Patrick T. Gillen, 24 Frank Lloyd Wright Drive, P.O. Box 393, Ann Arbor, MI 48106, (734) 827-2001

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Exhibit A to Maldonado and York Daily Record Subpoenas.

1. All drafts of any story written by Joe Maldonado relating to the Dover Area School District, its officers, school board, school board members, administration, employees, or staff (referred to collectively herein as “DASD”) or its schools from June 1, 2002 to the present.
2. Any document relating to any work by editorial staff relating to work of Maldonado relating to DASD from June 1, 2002 to the present, including but not limited editorial to comments upon, and/or revisions or changes to, such work.
3. All notes, writings, or work-product of any kind relating in any way to any story written by Joe Maldonado relating to DASD or its schools from June 1, 2002 to the present.
4. All communications from, by, or to, officers, staff, agents, and employees of the York Daily Record and Joe Maldonado regarding the accuracy and reliability of his work.
5. All communications to Maldonado or the York Daily Record relating to any complaints about Maldonado’s work.
6. Any job performance review of any kind concerning Joe Maldonado.
7. Any communications by Maldonado relating to Bill Buckingham, Alan Bonsell, Sheila Harkins, Heather Geesey, Jane Cleaver, Casey Brown, Jeff Brown, Noel Wenrich, Angie Yingling and other board members who have joined the board since September of 2004.
8. Any communications between Joe Maldonado and any person relating to DASD, Dover CARES, or candidates running under the banner of DOVER CARES from January 1, 2004 to the present.
9. Any communications from or to Joe Maldonado relating to the outcome of any primary or general election relating to the DASD from January 1, 2005 to the present.